

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF INDIANA
SOUTH BEND DIVISION**

IN RE:

NEW SCHOONEBEEK DAIRY, LLC
TAX ID/EIN: 61-1409707

1858 E. 800 S.
La Fontaine, IN 46940

Debtor.

CASE NO. 09-34327
Chapter 11

JOINT MOTION TO CONTINUE VALUATION HEARING

COME NOW Debtor, New Schoonebeek Dairy, LLC ("Debtor"), by counsel, and secured creditor North Central Cooperative, Inc. ("NCC"), by counsel, and respectfully petition the Court to continue the Valuation Hearing scheduled for June 29, 2011 for the following reasons:

1. In the Court's March 31, 2011, Memorandum Of Decision, the Court found that NCC holds a secured lien on the property of Debtor's estate to the extent that there are assets remaining for distribution at the time of confirmation of the Chapter 11 Plan. The Court further found that the valuation of NCC's secured status must be resolved by a Valuation Hearing. Therefore, the Court scheduled a Rule 3012 Hearing on Valuation for June 29, 2011.

2. At a Hearing on June 7, 2011, on Confirmation of the Debtor's Chapter 11 Plan, the Debtor moved to withdraw the Plan and the Court granted that Motion and instructed the Debtor to file an Amended Chapter 11 Plan no later than July 7, 2011.

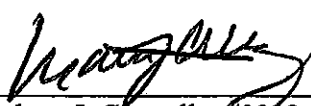
3. Before litigating the issue of the valuation of NCC's secured claim, NCC would like the opportunity of reviewing the Debtor's Amended Chapter 11 Plan. NCC's and the Debtor's attorneys have conducted preliminary discussions regarding the possible treatment of

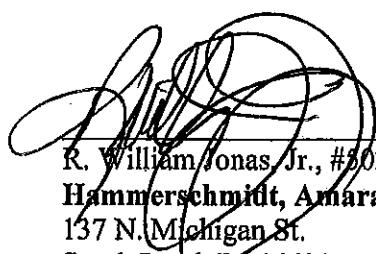
Amended Plan, and counsel for the parties believe that the terms of the Amended Plan as discussed may very well resolve the parties' dispute regarding the value of NCC's secured claim.

4. In furtherance of judicial economy and in an effort to resolve this valuation issue without the necessity of a Rule 3012 Hearing, the parties hereto would respectfully request the Court to continue the June 29, 2011 Valuation Hearing in order to allow the parties to review and discuss the terms of the anticipated Amended Chapter 11 Plan, which may obviate the necessity for the Valuation Hearing.

WHEREFORE, the parties hereto, by counsel, respectfully petition the Court to continue without date the Valuation Hearing currently scheduled for June 29, 2011.

Respectfully Submitted,


Matthew J. Connelly, #3332-02
Blume, Connelly, Jordan, Stucky & Lauer, LLP
110 West Berry Street, Suite 1700
Fort Wayne, IN 46802
Telephone: (260) 423-3525
Facsimile: (260) 423-3529
Email: lsavitz@bcjlaw.com
Attorney for NCC


R. William Jonas, Jr., #5025-71
Hammerschmidt, Amaral & Jonas
137 N. Michigan St.
South Bend, IN 46601
Telephone: 574-282-1231
Facsimile: 574-282-1234
Email: rwj@hajlaw.com
Attorney for Debtor

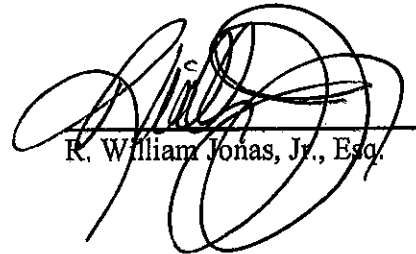
CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 20 day of June, 2011, a true and correct copy of the above and foregoing Joint Motion to Continue Valuation Hearing was served upon the following by filing electronically and via U.S. Mail, postage pre-paid:

Alexander L. Edgar
Office of the U.S. Trustee
One Michiana Square, Fifth Floor
100 E. Wayne Street
South Bend, IN 46601

Nancy Gargula
United States Trustee
One Michiana Square
100 East Wayne Street, Room 555
South Bend, IN 46601

Jay P. Kennedy
KROGER, GARDIS & REGAS, LLP
111 Monument Circle, Suite 900
Indianapolis, IN 46204



R. William Jonas, Jr., Esq.